

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

WILLIAM PANZINI,

Plaintiff,

vs.

TD BANK, N.A. & EQUIFAX
INFORMATION SERVICES, LLC,

Defendants.

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CASE NO.:

DEFENDANT TD BANK, N.A.’S NOTICE OF REMOVAL

PLEASE TAKE NOTICE that Defendant TD Bank N.A. (“***TD Bank***”), by its attorneys, Duane Morris LLP, hereby removes this action from the Superior Court of Fulton County, Georgia, to the United States District Court for the Northern District of Georgia, pursuant to 28 U.S.C. §§ 1331, 1367(a), 1391, 1441, 1446, and states as follows:

BACKGROUND

1. On August 16, 2024, Plaintiff William Panzini (“***Plaintiff***”) filed a Complaint in the State Action against Defendant TD Bank and Defendant Equifax Information Services, LLC (“***Equifax***”), captioned *William Panzini v. TD Bank, N.A. and Equifax Information Services, LLC*, Case No. 24CV010422 (the “***State Action***”).

2. A true and correct copy of the Summons and Complaint (the “***Complaint***”) is attached hereto as **Exhibit A**.

TIMELINESS OF REMOVAL

3. Plaintiff served the Complaint on TD Bank on August 28, 2024.
4. This Notice of Removal is timely pursuant to 28 U.S.C. § 1446(b) because it has been filed within thirty (30) days of TD Bank’s receipt of the Complaint.
5. TD Bank has attempted to obtain consent from Equifax by email correspondence and telephone but has been unable to do so; however, Equifax has consented to removal of similar State Actions in the past, and TD Bank anticipates it will also consent here.

FEDERAL QUESTION JURISDICTION

6. Removal is proper pursuant to 28 U.S.C. §§ 1331 and 1441 because Plaintiff’s case against TD Bank arises under federal law. *See* 28 U.S.C. § 1331 (“The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.”).
7. Plaintiff’s Complaint alleges TD Bank failed to adhere to the Fair Credit Reporting Act (“***FCRA***”), 15 U.S.C. § 1681, *et seq.* *See* Ex. A, Compl. ¶¶ 23, 28-32, 35-36.

VENUE

8. In accordance with 28 U.S.C. § 1391, venue is proper because the Complaint was originally filed in the Superior Court of Fulton County, Georgia. The United States District Court for the Northern District of Georgia is the appropriate district having jurisdiction over the place where the State Action was commenced. *See* 28 U.S.C. § 112.

ALL PROCEDURAL PREREQUISITES TO REMOVAL HAVE BEEN MET

9. TD Bank will promptly file a copy of this Notice of Removal with the Clerk of the Superior Court of Fulton County, Georgia, which will be served on all parties pursuant to 28 U.S.C. § 1446(d).
10. Pursuant to 28 U.S.C. § 1446(a), TD Bank attaches all process, pleadings and orders that have been filed, served, or received by TD Bank in this action.
11. By virtue of this Notice of Removal of Action and the Notice filed in the State Action, TD Bank does not waive its rights to assert any personal jurisdictional defenses or other motions including Rule 12 motions and/or motions to compel arbitration as permitted by the Federal Rules of Civil Procedure.
12. Based upon the record submitted with this Notice, this Court has jurisdiction over Plaintiff's claims and the Complaint is properly removed to this Court.

CONCLUSION

WHEREFORE, TD Bank removes this action to this Court and respectfully requests that this Court assume jurisdiction of this matter and take all further steps as may be required to determine this controversy.

Dated this 27th day of September, 2024.

Respectfully Submitted,

DUANE MORRIS LLP

/s/ Catherine G. Lucas

Catherine G. Lucas

GA Bar No. 567369

1075 Peachtree Street NE, Suite 1700

Atlanta, GA 30309-3929

Phone: 404-253-6912

Fax: 404-759-2158

Klucas@duanemorris.com

Counsel for Defendant TD Bank, N.A.

To: LaTonya Sims, Esq.
LaTonya.S@gitmeidlaw.com
100 Galleria Parkway, Suite 1570
Atlanta, Georgia 30339
Tel: (770) 874-2445
Fax: (770) 299-2111
Counsel for Plaintiff William Panzini

Attn: Law Department
Equifax Information Services, LLC
1550 Peachtree St.
Atlanta, GA 30309
Defendant

EXHIBIT A

General Civil and Domestic Relations Case Filing Information Form

Date: 8/16/2024 5:45 PM

Che Alexander, Clerk

☒ Superior or ☐ State Court of Fulton County

For Clerk Use Only

Date Filed 8/16/2024
MM-DD-YYYYCase Number 24CV010422

Plaintiff(s)

Panzini	William			
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix

Defendant(s)

Equifax	Information	Services	LLC.	
Last	First	Middle I.	Suffix	Prefix
TD	Bank		N.A.	
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix
Last	First	Middle I.	Suffix	Prefix

Plaintiff's Attorney LaTonya Sims State Bar Number 711135 Self-Represented ☐

Check one case type and one sub-type in the same box (if a sub-type applies):

General Civil Cases

- ☐ Automobile Tort
- ☐ Civil Appeal
- ☐ Contempt/Modification/Other Post-Judgment
- ☐ Contract
- ☐ Garnishment
- ☐ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Restraining Petition
- ☒ Other General Civil

Domestic Relations Cases

- ☐ Adoption
- ☐ Contempt
 - ☐ Non-payment of child support, medical support, or alimony
- ☐ Dissolution/Divorce/Separate Maintenance/Alimony
- ☐ Family Violence Petition
- ☐ Modification
 - ☐ Custody/Parenting Time/Visitation
- ☐ Paternity/Legitimation
- ☐ Support – IV-D
- ☐ Support – Private (non-IV-D)
- ☐ Other Domestic Relations

- ☐ Check if the action is related to another action pending or previously pending in this court involving some or all of the same: parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number

Case Number

- ☒ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in OCGA § 9-11-7.1.

- ☐ Is a foreign language or sign-language interpreter needed in this case? If so, provide the language(s) required.

Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.



IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA

136 PRYOR STREET, ROOM J2 C-103, ATLANTA, GEORGIA 30303

SUMMONS

<u>William Panzini</u>) Case	24CV010422
) No.:	
)	
<u>Plaintiff,</u>)	
)	
vs.)	
<u>TD Bank, N.A.</u>)	
)	
<u>EQUIFAX INFORMATION SERVICES, LLC.</u>)	
<u>Defendant</u>)	
)	
)	
)	
)	

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file electronically with the Clerk of said Court at <https://efilega.tylertech.cloud/OfsEfsp/ui/landing> (unless you are exempt from filing electronically) and serve upon plaintiff's attorney, whose name and address is:

LaTonya Sims, Esq.
Law Offices of Robert S. Gitmeid & Assoc., PLLC
30 Wall Street, 8th Floor #741
New York, NY 10005

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service; unless proof of service of this complaint is not filed within five (5) business days of such service. Then time to answer shall not commence until such proof of service has been filed. **IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**

This 16th day of August, 20 24

Honorable Ché Alexander, Clerk of

Superior Court

By

Deputy Clerk

To defendant upon whom this petition is served:

This copy of complaint and summons was served upon you _____, 20____

Deputy Sheriff

**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

WILLIAM PANZINI,

Plaintiff,

v.

TD BANK, N.A. & EQUIFAX
INFORMATION SERVICES, LLC.

Defendants.

CIVIL ACTION NO. 24CV010422

COMPLAINT

Plaintiff, William Panzini a/k/a Will Panzini (hereinafter “Plaintiff”), by and through the undersigned counsel, the Law Offices of Robert S. Gitmeid & Associates, PLLC, by way of Complaint against Defendants, TD Bank, N.A. (“TD”) and Equifax Information Services, LLC (“Equifax”) alleges as follows:

INTRODUCTION

1.

This is an action for damages brought by an individual consumer for Defendants’ violations of the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq.

(the “FCRA”) and other claims related to unlawful credit reporting practices. The FCRA prohibits furnishers of credit information from falsely and inaccurately reporting consumers’ credit information to credit reporting agencies.

PARTIES

2.

Plaintiff, William Panzini, is an adult citizen of New Hampshire.

3.

Plaintiff is a "consumer" as defined by 15 U.S.C. § 1681a(c) of the FCRA.

4.

Defendant TD is a financial services company that furnishes consumer credit information to consumer reporting agencies as that term is used in as that term is used in 15 U.S.C. § 1681s-2 of the FCRA.

5.

Defendant Equifax is a limited liability company, headquartered in Atlanta, Georgia, that engages in the business of maintaining and reporting consumer credit information. Equifax is a “consumer reporting agency” as defined in 15 U.S.C. § 1681a(f) of the FCRA.

JURISDICTION AND VENUE

6.

The Court holds jurisdiction over defendant TD under O.C.G.A. § 9-10-91 because (1) TD transacted business with Equifax in relation to the acts and omissions at issue; (2) TD's acts and omissions at issue were committed in Georgia by way of TD's interactions with Equifax; and (3) Plaintiff's injury in this case occurred in Georgia by way Equifax's inaccurate credit reporting.

7.

The Court holds jurisdiction over defendant Equifax under O.C.G.A. § 9-10-91 because (1) Equifax transacted business with TD in relation to the acts and omissions at issue; (2) Equifax's acts and omissions at issue were committed in Georgia by way of Equifax's interactions with TD; and (3) Plaintiff's injury in this case occurred in Georgia by way Equifax's inaccurate credit reporting.

8.

Venue is proper in Fulton County because defendant resides in Fulton County and because the acts and omissions at issue occurred here.

FACTUAL ALLEGATIONS

9.

Defendant TD issued account ending in 7851 to Plaintiff. The account was routinely reported on Plaintiff's consumer credit report.

10.

The consumer report at issue is a written communication of information concerning Plaintiff's credit worthiness, credit standing, credit capacity, character, general reputation, personal characteristics, or mode of living which is used or for the purpose of serving as a factor in establishing the consumer's eligibility for credit to be used primarily for personal, family, or household purposes as defined by 15 U.S.C. § 1681a(d)(1) of the FCRA.

11.

On or about February 15, 2023, Plaintiff and American Coradius International LLC on behalf of TD entered into a settlement agreement for the above referenced account. A copy of the settlement agreement is attached hereto as **Exhibit A**.

12.

Pursuant to the terms of the settlement, Plaintiff was required to make a lump sum payment totaling \$3,000.00 to settle and close his TD account.

13.

Plaintiff, via his debt-settlement representative, timely made the requisite settlement payment. Proof of this payment is attached hereto as **Exhibit B**.

14.

However, over a year later, Plaintiff's TD account continued to be negatively reported.

15.

In particular, on a requested credit report dated April 30, 2024, Plaintiff's TD account was reported with a status of "CHARGE OFF," a balance of \$6,002.00 and a past due balance of \$6,002.00. The relevant portion of Plaintiff's credit report is attached hereto as **Exhibit C**.

16.

This trade line was inaccurately reported. As evidenced by the enclosed documents, the account was settled for less than full balance and must be reported as settled with a balance of \$0.00.

17.

On or about May 31, 2024, Plaintiff, through counsel, notified Equifax directly of a dispute with completeness and accuracy of the reporting of Plaintiff's TD account. A redacted copy of this letter is attached hereto as **Exhibit D**.

18.

Therefore, Plaintiff disputed the accuracy of the derogatory information reported by TD to Equifax via certified mail in accordance with 15 U.S.C. § 1681i of the FCRA.

19.

In July of 2024, Plaintiff requested an updated credit report for review. The tradeline for Plaintiff's TD account remained inaccurate, as Defendants failed to correct the inaccuracy. The relevant portion of the July 2024 credit report is attached hereto as **Exhibit E**.

20.

Equifax did not notify TD of the dispute by Plaintiff in accordance with the FCRA; or alternatively Equifax did notify TD, and the Defendants failed to properly investigate and delete the tradeline or properly update the tradeline on Plaintiff's credit reports.

21.

If the Defendants had performed a reasonable investigation of Plaintiff's disputes, Plaintiff's TD account would have been updated to reflect a "settled" status with a balance of \$0.00.

22.

Although TD has promised through its subscriber agreements or contracts to accurately update accounts, TD has nonetheless willfully, recklessly, or negligently failed to follow this requirement, as well as the requirements set forth under the FCRA. This has resulted in the intended consequences of this information remaining on Plaintiff's credit reports.

23.

Defendants failed to properly maintain and failed to follow reasonable procedures to assure maximum possible accuracy of Plaintiff's credit information and Plaintiff's credit report, concerning the account in question, thus violating the FCRA. These violations occurred before, during, and after the dispute process began with Equifax.

24.

At all times pertinent hereto, Defendants were acting by and through their agents, servants and employees, who were acting within the scope and course of their employment, and under the direct supervision and control of the Defendants herein.

25.

At all times pertinent hereto, the conduct of Defendants, as well as that of their agents, servants and employees, was intentional, willful, reckless, or negligent and in wanton disregard for federal law and the rights of the Plaintiff herein.

CLAIM FOR RELIEF

26.

Plaintiff reasserts and incorporates herein by reference all facts and allegations set forth above.

27.

Equifax is a “consumer reporting agency,” as codified at 15 U.S.C. § 1681a(f).

28.

TD is an entity who, regularly and in the course of business, furnishes information to one or more consumer reporting agencies about its transactions or experiences with any consumer and therefore constitutes a “furnisher,” as codified at 15 U.S.C. § 1681s-2.

29.

TD is reporting inaccurate credit information concerning Plaintiff to one or more credit bureaus as defined by 15 U.S.C. § 1681a of the FCRA.

30.

Plaintiff notified Defendants directly of a dispute on the account’s completeness and accuracy, as reported.

31.

TD failed to complete an investigation of Plaintiff’s written dispute and provide the results of an investigation to Plaintiff and the credit bureaus within the 30-day statutory period as required by 15 U.S.C. § 1681s-2(b).

32.

TD failed to promptly modify the inaccurate information on Plaintiff's credit report in violation of 15 U.S.C. § 1681s-2(b).

33.

Equifax failed to delete information found to be inaccurate, reinserted the information without following the FCRA, or failed to properly investigate Plaintiff's disputes.

34.

Equifax failed to maintain and failed to follow reasonable procedures to assure maximum possible accuracy of Plaintiff's credit report, concerning the account in question, violating 15 U.S.C. § 1681e(b).

35.

As a result of the above violations of the FCRA, Plaintiff suffered actual damages in one or more of the following categories: lower credit score, denial of credit, embarrassment and emotional distress caused by the inability to obtain financing for everyday expenses, rejection of credit card application, higher interest rates on loan offers that would otherwise be affordable, and other damages that may be ascertained at a later date.

36.

As a result of the above violations of the FCRA, Defendants are liable to Plaintiff for actual damages, punitive damages, statutory damages, attorney's fees and costs.

WHEREFORE, Plaintiff demands that judgment be entered against Defendants as follows:

- (a) That judgment be entered against Defendants for actual damages pursuant to 15 U.S.C. § 1681n or alternatively, 15 U.S.C. § 1681o;
- (b) That judgment be entered against Defendants for statutory damages pursuant to 15 U.S.C. § 1681n;
- (c) That judgment be entered against Defendants for punitive damages pursuant to 15 U.S.C. § 1681n;
- (d) That the Court award costs and reasonable attorney's fees pursuant to 15 U.S.C. § 1681n or alternatively, 15 U.S.C. § 1681o; and
- (e) That the Court grant such other and further relief as may be just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands trial by jury in this action of all issues so triable.

Respectfully Submitted,

**Law Offices of Robert S. Gitmeid &
Associates, PLLC**

/s/ LaTonya Sims

LaTonya Sims, Esq.

Georgia Bar No. 711135

LaTonya.S@gitmeidlaw.com

100 Galleria Parkway, Suite 1570

Atlanta, Georgia 30339

Tel: (770) 874-2445

Fax: (770) 299-2111

Counsel for Plaintiff William Panzini

EXHIBIT A

American Coradius International LLC
2420 Sweet Home Rd Suite 150
Amherst NY 14228
1-800-498-2242

15 FEB 2023

WILL A PANZINI

17501992

Creditor: TD BANK N.A.

Account Balance: \$ 9002.08 Account Number: XXXXXXXXXXXX7851

Dear: WILL A PANZINI

We are writing to you regarding your TD BANK N.A. account.

As of the date of this letter you owe \$9002.08.

This letter, will serve as confirmation that American Coradius International LLC, is willing to accept \$3000.00 to resolve the account for less than the full balance on the above referenced account.

This offer requires that American Coradius International LLC receives your funds in the amount of \$3000.00 on or before 02-28-23.

If you wish to discuss this offer further, please contact our office at 1-855-295-8173 at your convenience.

Upon clearance of your payment, we will notify our client so they can update their records accordingly.

Make your check or money order payable to:
American Coradius International LLC
2420 Sweet Home Rd, Suite 150
Amherst NY 14228

This communication is from a debt collector. This is an attempt to collect a debt and any information will be used for that purpose.
Calls to or from this company may be monitored or recorded for quality assurance purposes.

NOTICE: PLEASE SEE SECOND PAGE FOR IMPORTANT INFORMATION.

EXHIBIT B

WILL A PANZINI

CHK# 5556

FEBRUARY 28 2023

Pay to the order of American Coradius International, LLC \$ 3,000.00

THREE THOUSAND AND NO HUNDREDTHS Dollars

C Comerica Bank
Detroit, MI

For [REDACTED] TD BANK, N.A. [REDACTED] SIGNATURE PREAUTHORIZED
This check authorized by your depositor, call: [REDACTED] Authorized Signature of Payee

EXHIBIT C

Credit report

Provided by **EQUIFAX**

Your credit is in poor shape

Report date: Apr 30, 2024



Personal info

Reported names	William A Panzini	Addresses	Date reported
DOB			
SSN			
Employment info			

Account summary



Accounts



Credit cards



The Law Offices of
ROBERT S. GITMEID & ASSOC., PLLC

May 31, 2024

VIA CERTIFIED MAIL

Transunion Consumer Solutions
P.O. Box 2000
Chester, PA 19016

Equifax Information Services, LLC
P.O. Box 740256
Atlanta, GA 30374-0256

Experian
P.O. Box 4500
Allen, TX 75013

Re:	William Panzini a/k/a Will Panzini
Creditor:	TD Bank, National Association d/b/a Jordan's Furniture
Collection Agency:	American Coradius International LLC
Account No.:	Ending in 7851
SSN:	Ending in [REDACTED]
Address:	[REDACTED]

Dear Sir and/or Madam,

Please be advised that this office was retained to represent William Panzini a/k/a Will Panzini with respect to his claims for violations under the Fair Credit Reporting Act, 15. U.S.C. § 1681, et seq. (the "FCRA") and other claims related to unlawful credit reporting practices.

On or about February 15, 2023, Ms. Panzini and American Coradius International LLC on behalf of TD Bank, N.A. d/b/a Jordan's Furniture ("TD/Jordan's") entered into a settlement agreement for the above-referenced account. A copy of the settlement agreement is attached herein for your review. Pursuant to the terms of the settlement, Mr. Pazini was required to make a lump sum payment totaling \$3,000.00 to settle and close his TD/Jordan's account. Mr. Panzini, via his debt settlement representative, timely made the requisite settlement payment. Proof of this payment is attached herein for your review.

However, over a year later, Mr. Panzini's account continues to be negatively reported. In particular, on a requested credit report dated April 30, 2024, Mr. Panzini's account was reported with a status of "CHARGE OFF", a balance of \$6,002.00 and a past due balance of \$6,002.00. The relevant portion of Mr. Panzini's credit report is attached herein for your review. The trade line was inaccurately reported. As evidenced by the enclosed documents, the account was settled in full and has a balance of \$0.00.

Please take notice that this dispute is made pursuant to 15 U.S.C. § 1681i under the FCRA. Therefore, if this inaccuracy is not corrected within thirty (30) days, we will pursue further legal process on behalf of our client.

Thank you for your prompt attention to this important matter.

Very truly yours,

Melissa Rodriguez
Paralegal
The Law Offices of Robert S. Gitmeid
& Associates, PLLC
Melissa.R@gitmeidlaw.com
(866) 249-1137

American Coradius International LLC
2420 Sweet Home Rd Suite 150
Amherst NY 14228
1-800-498-2242

15 FEB 2023

WILL A PANZINI

17501992

Creditor: TD BANK N.A.

Account Balance: \$ 9002.08 Account Number: XXXXXXXXXXXX7851

Dear: WILL A PANZINI

We are writing to you regarding your TD BANK N.A. account.

As of the date of this letter you owe \$9002.08.

This letter, will serve as confirmation that American Coradius International LLC, is willing to accept \$3000.00 to resolve the account for less than the full balance on the above referenced account.

This offer requires that American Coradius International LLC receives your funds in the amount of \$3000.00 on or before 02-28-23.

If you wish to discuss this offer further, please contact our office at 1-855-295-8173 at your convenience.

Upon clearance of your payment, we will notify our client so they can update their records accordingly.

Make your check or money order payable to:
American Coradius International LLC
2420 Sweet Home Rd, Suite 150
Amherst NY 14228

This communication is from a debt collector. This is an attempt to collect a debt and any information will be used for that purpose.

Calls to or from this company may be monitored or recorded for quality assurance purposes.

NOTICE: PLEASE SEE SECOND PAGE FOR IMPORTANT INFORMATION.

WILL A PANZINI

CHK# 5556

FEBRUARY 28 2023

Pay to the order of American Coradius International, LLC \$ 3,000.00

THREE THOUSAND AND NO HUNDREDS Dollars

Comerica Bank
Detroit, MI

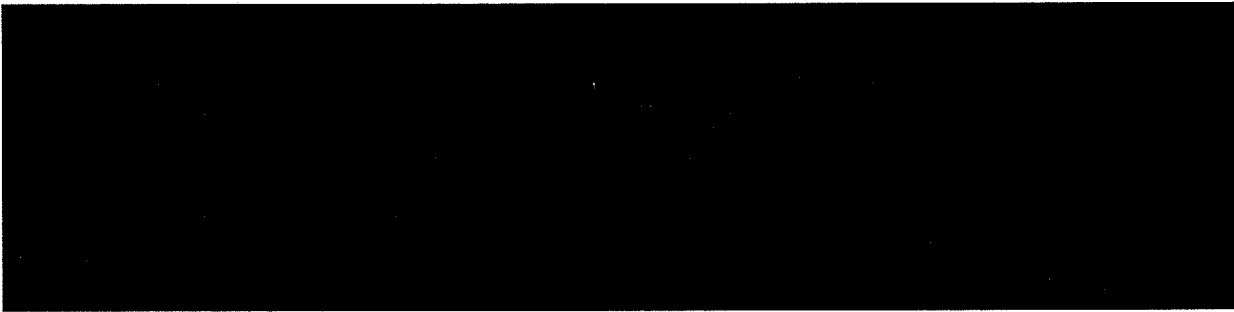
For [REDACTED] TD BANK, N.A. [REDACTED] SIGNATURE PREAUTHORIZED
This check authorized by your depositor, call: [REDACTED] Authorized Signature of Payee

Credit report

Provided by **EQUIFAX**

Your credit is in poor shape

Report date: Apr 30, 2024



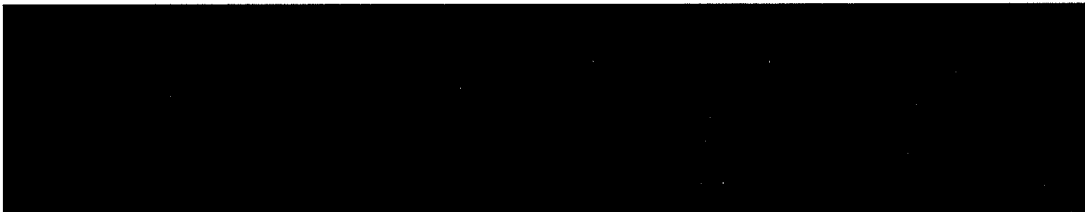
Personal info

Reported names	William A Panzini	Addresses	Date reported
DOB			
SSN			
Employment info			

Account summary



Accounts



Credit cards

EXHIBIT E

Credit report

TransUnion Equifax Experian All bureaus

Bureau

TransUnion

EQUIFAX

experian



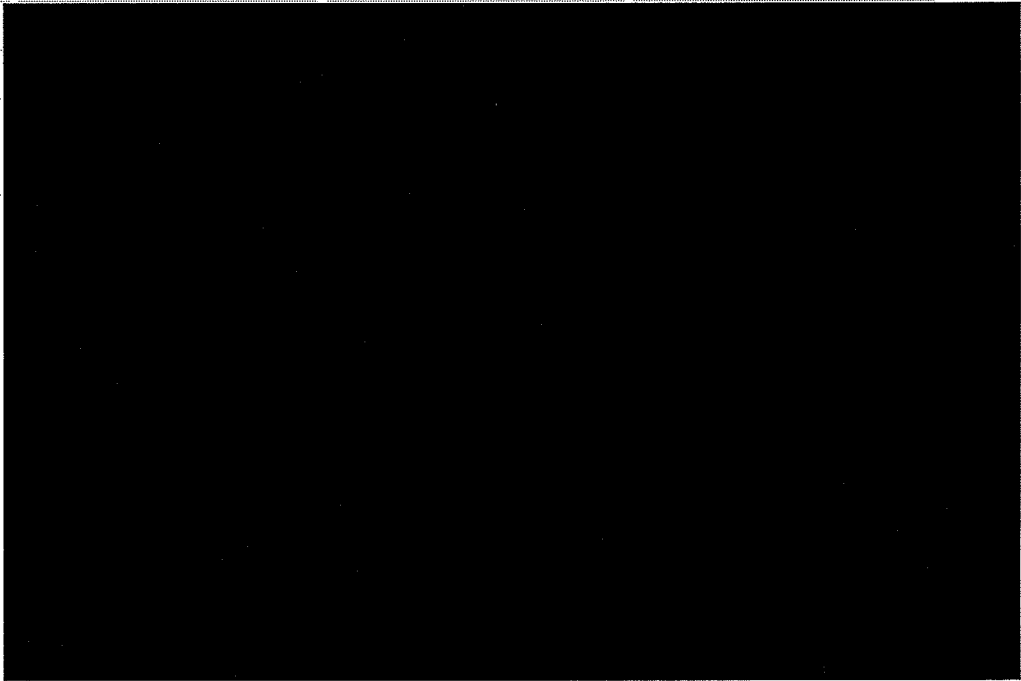
Report date Jul 26, 2024 Jul 26, 2024 Jul 26, 2024



Personal info

Reported names William A Panzini William A Panzini William A Panzini
Will A Cahill William A Cahill
William Cahill Panzini Panzini William Cahill
Will A Cahill

DOB
SSN
Employment info
Addresses



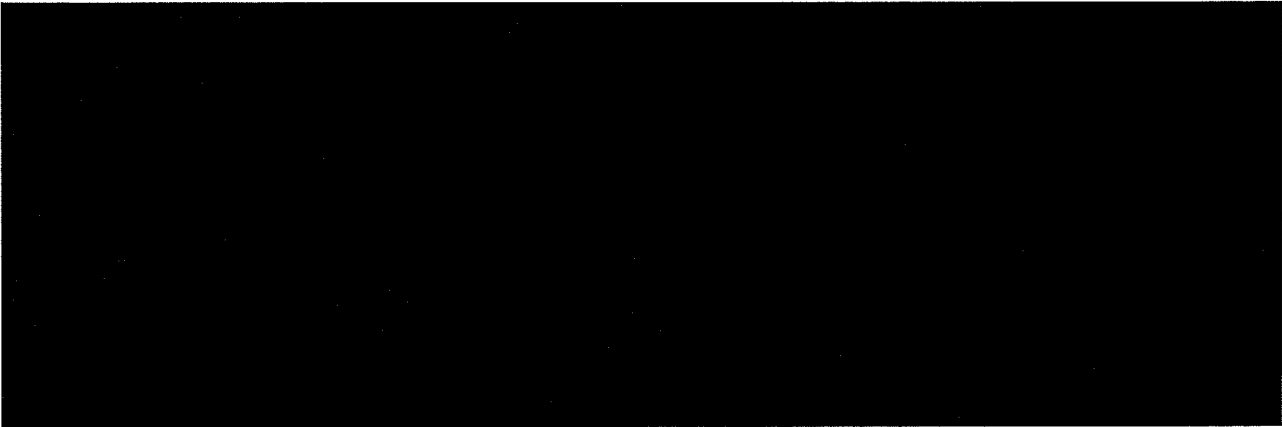
Account summary

Bureau

TransUnion

EQUIFAX

experian



Account details

You've Made 13% Of Payments For This Account On Time.

2024	Jan	Feb	Mar	Apr	May	Jun
	CC	CC	CC	CC	CC	CC
	Jul	Aug	Sep	Oct	Nov	Dec

2023	Jan	Feb	Mar	Apr	May	Jun
	CC	CC	CC	CC	CC	CC
	Jul	Aug	Sep	Oct	Nov	Dec
	CC	CC	CC	CC	CC	CC

2022	Jan	Feb	Mar	Apr	May	Jun
	CC	CC	CC	CC	CC	CC
	Jul	Aug	Sep	Oct	Nov	Dec
	CC	CC	CC	CC	CC	CC

2021	Jan	Feb	Mar	Apr	May	Jun
	30	60	90	120	120	CC
	Jul	Aug	Sep	Oct	Nov	Dec
	CC	CC	CC	CC	CC	CC

2020	Jan	Feb	Mar	Apr	May	Jun
	Jul	Aug	Sep	Oct	Nov	Dec
	OK	OK	OK	OK	OK	OK

OK Paid on time

30 30 days past due

60 60 days past due

90 90 days past due

120 120 days past due

150 150 days past due

BR Bankruptcy

RE Repossession or foreclosure

CC Collection or charge off

VS Voluntary surrender

N/A No data available

Collection agency

TD RCS/JORDAN'S FURN
1000 MCARTHUR BLVD
MAHWAH, NJ 07430
(201) 818-4000

Account ID:

864b5882646cd423e6df451220a893bb

https://researchga.tylerhost.net/CourtRecordsSearch/ViewCasePrint/b5d3feec31f53beabc00392a9566b75

Case Information

William Panzini VS. TD Bank, N.A., Equifax Information Services, LLC.

24CV010422

Location
Fulton - Superior Court

Case Category
Civil

Case Type
DAMAGES

Case Filed Date
8/16/2024

Judge
EDWARDS, BELINDA E.

Case Status
Open (Open)

Parties 3

Type	Name	Nickname/Alias	Attorneys
DEFENDANT	TD Bank, N.A.		
DEFENDANT	Equifax Information Services, LLC.		
PLAINTIFF	William Panzini		LaTonya Sims

Events 6

Date	Event	Type	Comments	Documents
8/16/2024	Filing	SUMMONS	Plaintiff's Summons against Defendant	SUMMONS.pdf
8/16/2024	Filing	PLAINTIFF'S ORIGINAL PETITION	Plaintiff's Complaint against Defendant with Exhibits	COMPLAINT.pdf
8/16/2024	Filing	SUMMONS	Plaintiff's Summons against Defendant	SUMMONS.pdf
8/16/2024	Filing	CASE INITIATION FORM	Civil Case Initiation Form	CASE INITIATION FORM.pdf
9/4/2024	Filing	AFFIDAVIT OF SERVICE	Affidavir of Service as to Defendant TD Bank	AFFIDAVIT OF SERVICE.pdf
9/6/2024	Filing	AFFIDAVIT OF SERVICE	Affidavit of Service as to Defendant Equifax	AFFIDAVIT OF SERVICE.pdf





IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA
136 PRYOR STREET, ROOM J2 C-103, ATLANTA, GEORGIA 30303
SUMMONS

William Panzini)	Case
)	24CV010422
Plaintiff,)	No.:
vs.)	
TD Bank, N.A.)	
EQUIFAX INFORMATION SERVICES, LLC.)	
Defendant)	
)	
)	
)	
)	

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file electronically with the Clerk of said Court at <https://efilega.tylertech.cloud/OfsEfsp/ui/landing> (unless you are exempt from filing electronically) and serve upon plaintiff's attorney, whose name and address is:

LaTonya Sims, Esq.
Law Offices of Robert S. Gitmeid & Assoc., PLLC
30 Wall Street, 8th Floor #741
New York, NY 10005

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service; unless proof of service of this complaint is not filed within five (5) business days of such service. Then time to answer shall not commence until such proof of service has been filed. **IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**

This 16th day of August, 20 24

Honorable Ché Alexander, Clerk of
Superior Court

By *Justin M. Reyes*
Deputy Clerk

To defendant upon whom this petition is served:

This copy of complaint and summons was served upon you _____, 20____

Deputy Sherriff



IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA
136 PRYOR STREET, ROOM J2 C-103, ATLANTA, GEORGIA 30303
SUMMONS

<u>William Panzini</u>) Case	24CV010422
) No.:	_____
)	
<u>Plaintiff,</u>)	
)	
vs.)	
<u>TD Bank, N.A.</u>)	
)	
<u>EQUIFAX INFORMATION SERVICES, LLC.</u>)	
<u>Defendant</u>)	
)	
)	
)	

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file electronically with the Clerk of said Court at <https://efilega.tylertech.cloud/OfsEfsp/ui/landing> (unless you are exempt from filing electronically) and serve upon plaintiff's attorney, whose name and address is:

LaTonya Sims, Esq.
Law Offices of Robert S. Gitmeid & Assoc., PLLC
30 Wall Street, 8th Floor #741
New York, NY 10005

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service; unless proof of service of this complaint is not filed within five (5) business days of such service. Then time to answer shall not commence until such proof of service has been filed. **IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**

This 16th day of August, 20 24

Honorable Ché Alexander, Clerk of
Superior Court

By *Yusef J. Reyes*
Deputy Clerk

To defendant upon whom this petition is served:

This copy of complaint and summons was served upon you _____, 20____

Deputy Sherriff

IN THE SUPERIOR COURT OF FULTON COUNTY STATE OF GEORGIA

WILLIAM PANZINI,

Plaintiff,

v.

TD BANK, N.A. & EQUIFAX
INFORMATION SERVICES, LLC,

Defendants.

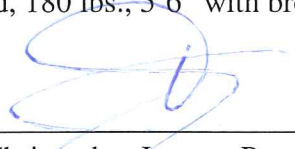
C.A. No.: 24CV010422

STATE OF DELAWARE)
 SS.:
COUNTY OF NEW CASTLE)

AFFIDAVIT OF SERVICE


I, Christopher Jones, being duly sworn and deposed says that I am not a party to this action, am over eighteen (18) years old, and reside in Delaware. That on August 30, 2024, at 2:54 p.m., I personally served true copies of a Summons, Complaint with Exhibits, and Civil Case Filing Information Form upon, **Equifax Information Services, LLC**, by serving the registered agent, Corporation Service Company at 251 Little Falls Drive, Wilmington, DE 19808.

Service was accepted by Lynanne Gares, Litigation Management Services Leader, authorized to accept service. Ms. Gares is a Caucasian female, 50 years old, 180 lbs., 5'6" with brown hair.



Christopher Jones – Process Server
800 King Street, Suite 102
Wilmington, DE 19801

Sworn to me this 3rd day of September, 2024.



Notary Public



AFFIDAVIT OF SERVICE

State of Georgia

County of Fulton

Superior Court

Case Number: 24CV010422

Plaintiff:
WILLIAM PANZINI

vs.

Defendant:
TD BANK N.A.

For:
GITMEID, ROBERT S. & ASSOCIATES, PLLC
30 Wall Street
8th Floor, #741
New York, NY 10005

Received by COURT HOUSE LEGAL SERVICES, INC. to be served on **TD BANK, N.A., 1701 RT. 70 EAST, CHERRY HILL, NJ 08003.**

I, Albert Glander, being duly sworn, depose and say that on the **28th day of August, 2024 at 9:30 am, I:**

AUTHORIZED: served by delivering a true copy of the **SUMMONS AND COMPLAINT WITH EXHIBITS AND CIVIL DOMESTIC FILING INFORMATION FORM** to **DAMIAN OLDFIELD** as **ASST SALES MANAGER**, who stated they are authorized to accept service for: **TD BANK, N.A.** at the address of: **1701 RT. 70 EAST, CHERRY HILL, NJ 08003**, and informed said person of the contents therein, in compliance with state statutes.

Description of Person Served: Age: 45, Sex: M, Race/Skin Color: BLACK, Height: 6-0, Weight: 200, Hair: BLACK, Glasses: Y

I am over the age of 18 and have no interest in the above action.

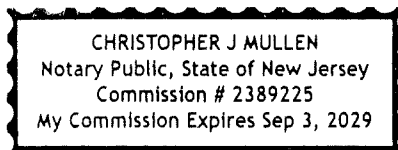


Albert Glander
Process Server

Subscribed and Sworn to before me on the 30th day of August, 2024 by the affiant who is personally known to me.



NOTARY PUBLIC



COURT HOUSE LEGAL SERVICES, INC.
112 Haddontowne Ct, Ste. 304
Cherry Hill, NJ 08034
(856) 428-4700

Our Job Serial Number: CHL-2024008778
Ref: WILLIAM PANZINI